

AB:MJB

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

PRE-ARRAIGNMENT  
COMPLAINT

- against -

(T. 21, U.S.C., §§ 952(a), 960(a)(1))

RADESKOEMAR KOELFAT and  
GEORGETIENE LOUISE BEATRIX CHAN No. 19-1015M  
A HUNG,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DAVID CHENG, being duly sworn, deposes and states that he is a Special Agent with Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about October 29, 2019, within the Eastern District of New York and elsewhere, the defendants RADESKOEMAR KOELFAT and GEORGETIENE LOUISE BEATRIX CHAN A HUNG did knowingly and intentionally import controlled substances into the United States from a place outside thereof, which offense involved substances containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1))

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. On or about October 29, 2019, the defendants RADESKOEMAR KOELFAT and GEORGETIENE LOUISE BEATRIX CHAN A HUNG arrived at John F. Kennedy International Airport in Queens, New York, ("JFK Airport") aboard Caribbean Airlines flight BW524. The flight originated in Suriname in South America and was routed through the Port of Spain in Trinidad and Tobago. The defendants were traveling together.

2. After the defendants disembarked from their flight at JFK Terminal 4, Customs and Border Protection Officers ("CBP") conducted a bag exam on the defendants' bags which produced negative results. During the bag exam, CHAN A HUNG exhibited nervous behavior, including a visible pulsating carotid artery, clenching her jaw and shaky hands. KOELFAT also exhibited nervous behavior during the bag check, including clenching his jaw and having shaky hands.

3. The CBP officers also conducted pat downs of both defendants with negative results.

4. The CBP officers interviewed both defendants and determined that the defendants had no friends or family in New York and no hotel reservations in New York. Instead, the defendants were in possession of a reservation for a hotel located in Baton Rouge, Louisiana. In addition, during their interviews with CBP officials, both defendants

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<sup>1</sup> Because the purpose of this complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

admitted that they ingested pellets of cocaine and had not passed the pellets before landing in JFK.

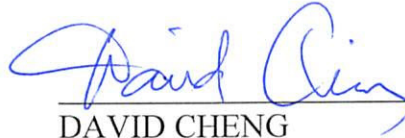
5. CBP officials presented both defendants with x-ray consent forms, which the defendants signed. Both defendants were subsequently taken to a JFK medical facility where they were x-rayed by a physician. Both defendants' x-ray results were positive for foreign bodies in their stomachs and anal cavities.

6. As of the date and time of the filing of this complaint, KOELFAT has passed approximately 34 pellets of those that remain secreted inside his body. One of the pellets was probed and found to contain a white powdery substance that field-tested positive for cocaine.

7. As of the date and time of the filing of this complaint, CHAN A HUNG passed 22 pellets. One of the pellets was probed and found to contain a white powdery substance that field-tested positive for cocaine.

8. The defendants RADESKOEMAR KOELFAT and GEORGETIENE LOUISE BEATRIX CHAN A HUNG will be detained at the JFK Airport medical facility until such time as they have passed all the pellets contained in their bodies.

WHEREFORE, your deponent respectfully requests that the defendants  
RADESKOEMAR KOELFAT and GEORGETIENE LOUISE BEATRIX CHAN A HUNG  
be dealt with according to law.



DAVID CHENG  
Special Agent  
Homeland Security Investigations

Sworn to before me this  
30th day of October, 2019

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THE HONORABLE RAMON E. REYES  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK